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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 ZACHARY BALES,
15 Defendant.

Case No. 2:23-cr-00196-RFB-NJK

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Lauren Ibanez, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,
20 Assistant Federal Public Defender, counsel for Zachary Bales, that the Revocation Hearing
21 currently scheduled on October 31, 2024, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than one (1) day.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel plans to be out of the district October 29, 2024, through October
25 31, 2024.
26 2. The defendant is out of custody and agrees with the need for the continuance.
3. The parties agree to the continuance.

1 This is the first request for a continuance of the revocation hearing.

2 DATED this 15th day of October, 2024.

3
4 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

5
6 By /s/ Rick Mula
7 RICK MULA
8 Assistant Federal Public Defender

By /s/ Lauren Ibanez
LAUREN IBANEZ
Assistant United States Attorney

